

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

VISION MAKERS, INC., a Pennsylvania corporation; NAJJAA BEN ABDULLAH MUHAMMAD, also known as HENRY R. HANEY, an individual; and THE HONORABLE PETER F. ROGERS (RET.), an individual,	:	CIVIL ACTION NO. 2:20-cv-6224
	:	
Plaintiffs,	:	JURY TRIAL DEMANDED
	:	
v.	:	
	:	
WALMART INC., a Delaware corporation; and DOES 1-10, inclusive,	:	
	:	
Defendants.	:	
	:	
	:	

Plaintiffs Vision Makers, Inc., Henry R. Haney, and Peter F. Rogers, through the undersigned counsel, allege the following against the Defendants named herein:

INTRODUCTION

1. This matter concerns the blatant appropriation and infringement of an extraordinary copyrighted lithograph of the great boxer and humanitarian Muhammad Ali.
2. Plaintiffs, independent Black photographers who developed a personal relationship with Ali in the 1970s, created their copyrighted lithograph with Ali's blessing, using their personally authorized photo of Ali taken shortly before his 1980 fight with Larry Holmes.
3. Defendant Walmart Inc., independently and through its recent acquiree Art.com, Inc., brazenly claimed this image and lithograph as its own; disregarded Plaintiffs' ownership of the image; and sold and displayed the lithograph over the internet.
4. Despite being put on notice by Plaintiffs in 2018, and repeatedly thereafter, Walmart and

Art.com persisted with this wrongful conduct. Walmart continued to include Plaintiffs' lithograph on its websites, all the while ignoring the fact that Plaintiffs had created and copyrighted the work that they claimed as their own.

5. Plaintiffs therefore have no choice but to bring this action seeking redress for the willful and offensive conduct of Walmart and Art.com.

JURISDICTION AND VENUE

6. The Court has subject matter jurisdiction over this action for the infringement of a United States copyright pursuant to 17 U.S.C. § 501 *et seq.* and 28 U.S.C. §§ 1331 and 1338(a).

7. The Court has personal jurisdiction over Defendant Walmart Inc. because, on information and belief, Defendant qualifies as a foreign corporation under the laws of the Commonwealth of Pennsylvania, 42 Pa.C.S. § 5301(a)(2)(i). In addition, Walmart regularly conducts business in Pennsylvania and in this District by, *inter alia*, selling and licensing products throughout the Commonwealth of Pennsylvania. Further, the wrongful conduct at issue, which constitutes copyright infringement, has occurred in this District and has caused Plaintiffs to suffer harm in this District.

8. Venue in this district is proper pursuant to 28 U.S.C. §§ 1391 because, *inter alia*, Defendant Walmart is doing business in this District, and Defendant's acts or omissions giving rise to this lawsuit, as well as substantial injury to Plaintiffs, have occurred and will continue to occur in interstate commerce, in the Commonwealth of Pennsylvania, and in this District. Venue is also proper pursuant to 28 U.S.C. § 1400(a) because, *inter alia*, Defendant resides in and/or can be found in this District.

PARTIES

9. Vision Makers, Inc. (“Vision Makers”) is a Pennsylvania corporation with its principal place of business at 715 Yale Road, Bala Cynwyd, Pennsylvania 19004.

10. Henry R. Haney (“Haney”) and Peter F. Rogers (“Rogers”) are individuals domiciled in Maryland and Florida, respectively. Haney and Rogers are, and have always been, Vision Makers’ sole shareholders. Vision Makers, Haney and Rogers are referred to collectively herein as “Plaintiffs.”

11. Walmart Inc. is a Delaware corporation with its principal place of business at 702 Southwest 8th Street, Bentonville, Arkansas 72716 (“Walmart”).

12. In or about February 2019, Walmart acquired all assets and United States operations of Art.com, Inc. (“Art.com”), and is liable for the prior conduct of Art.com, Inc. as alleged herein. Walmart has been and continues to operate as a continuation of Art.com, Inc.

13. Plaintiffs are unaware of the true names and capacities of Does 1 through 10, and therefore sue these defendants by these fictitious names. Plaintiffs will amend this complaint to allege the Doe Defendants’ true names and capacities when they become known to Plaintiffs.

14. On information and belief, in performing the acts or omissions described in this Complaint, Defendant Walmart Inc. and Does 1 through 10 (collectively, “Defendants”) were acting as the principal, representative, agent, employee or alter ego of each other and were acting within the scope of such agency or employment to commit the acts alleged herein. Each Defendant sued herein aided and abetted the other with the intent that each would be successful in their mutual endeavors. Each Defendant contributed to Plaintiffs’ damages and the statutory violations alleged herein.

ALLEGATIONS

Plaintiffs' Creation, Copyrighting, and Distribution of the Ali Copyrighted Lithograph Poster

15. During the 1980s, Plaintiffs Rogers and Haney became acquainted with the famed boxer, activist, and philanthropist Muhammad Ali (“Ali”). Plaintiffs Rogers and Haney were frequent visitors to Ali’s Deer Lake training camp in the Pocono Mountains and, after developing a friendship with Ali, were permitted to photograph Ali during his training sessions. Plaintiff Haney was, and is, a professional photographer and videographer.

16. On October 1, 1980, Plaintiff Haney was an invited guest inside Muhammad Ali’s Caesar’s Palace Suite during an ABC worldwide televised prefight interview conducted from New York by Ted Koppel. Plaintiff Haney captured a still photograph of Ali within the confines of Ali’s Suite during the referenced broadcast (“the Subject Photograph”). In the Subject Photograph, Ali is holding up four fingers, signifying his intention to defeat Holmes and capture the Heavyweight crown for an unprecedented fourth time. (Neither came to fruition: Ali lost the fight, and fought one more time before retiring.)

17. Plaintiffs Haney and Rogers featured this Subject Photograph in an originally created and designed lithographic poster (the “Copyrighted Lithographic Poster”). The Copyrighted Lithographic Poster contains at least five original component parts: (1) the Subject Photograph; (2) the title, namely “ALI” repeated six times in blue block letters of increasing size, overlaying the Subject Photograph; (3) the quote “I SHALL RETURN” beneath the Subject Photograph; (4) sixty boxing gloves with each glove signifying one of Ali’s fights and detailing the opponent, date, location, and result; and (5) a legend explaining that the gold-colored gloves marked with an asterisk signify a championship fight. An image of the Copyrighted Lithographic Poster is attached hereto as Exhibit A.

18. On Wednesday, November 12, 1980, Plaintiff Rogers flew to Los Angeles, California and was received as an invited guest to Muhammad Ali's then Hancock Park residence. Plaintiff Rogers, on behalf of himself and Plaintiff Haney, obtained Ali's permission in a signed writing to use the October 1, 1980 photograph captured by Plaintiff Haney together with Ali's name in connection with the Copyrighted Lithographic Poster, and the right to sell the Copyrighted Lithographic Poster in the United States and internationally. In 1980, Plaintiff Rogers was a licensed Pennsylvania attorney and on December 31, 2015, retired during his second ten-year commission as a judge on the Philadelphia Court of Common Pleas. Currently, Plaintiff Rogers is a professional fine arts photographer.

19. In December 1980, Plaintiffs Haney and Rogers applied to obtain copyright registration for the Copyrighted Lithographic Poster, as joint authors, on behalf of Vision Makers, Inc., a Pennsylvania corporation of which Haney and Rogers have at all times been the sole shareholders.

20. Plaintiffs Haney and Rogers, on behalf of Vision Makers, own the copyright in the Copyrighted Lithographic Poster, entitled "ALI ALI ALI ALI ALI ALI," which was registered with the United States Copyright Office on December 8, 1980 with the Registration Number VA 63-797. Plaintiffs are the sole owners of the exclusive rights in the Copyrighted Lithographic Poster. A true and correct copy of the Certificate of Copyright Registration at issue in this case is attached hereto as Exhibit B.

21. During the 1980s, Plaintiffs offered for sale and sold the Copyrighted Lithographic Poster. The Copyrighted Lithographic Poster also contains a copyright registration notice, indicating the year of registration (1980), identifying Vision Makers, Inc., and listing an address for Vision Makers, Inc. in Pennsylvania.

22. Plaintiffs are not currently offering for sale or selling the Copyrighted Lithographic Poster.

**Defendants' Unauthorized Use, Display, Reproduction, and Sale
of the Copyrighted Lithograph Poster**

23. On or about July 30, 2018, Plaintiffs discovered that Art.com was using, displaying, reproducing, distributing, and selling the Copyrighted Lithographic Poster for commercial purposes and without Plaintiffs' permission.

24. On or about July 30, 2018, Art.com was displaying and offering for sale the Copyrighted Lithographic Poster on its websites including Art.com, AllPosters.com, and WorkspaceArt.com. Screenshots from those websites showing the Copyrighted Lithographic Poster embedded therein are attached hereto as Exhibit C.

25. In or around November 2018, Plaintiffs confronted Art.com regarding its blatant infringement of Plaintiffs' copyright.

26. On information and belief, Art.com nevertheless continued to use, display, reproduce and distribute the Copyrighted Lithographic Poster on and through these and other websites. In addition, Art.com's conduct caused Plaintiffs' copyrighted work to be displayed on Pinterest. Screenshots capturing this continuing infringement are attached hereto as Exhibit D.

27. Plaintiffs informed Art.com of its continuing infringement again in January 2019. Yet, on information and belief, Walmart, after acquiring Art.com, continued to use, display, reproduce, and distribute the Copyrighted Lithographic Poster on and through its various websites. A December 9, 2019 screen shot offering the Copyrighted Lithographic Poster for sale on Walmart.com is attached hereto as Exhibit E. Indeed, as recently as August 26, 2020, a search via Google Images returned Walmart-created images of the Copyrighted Lithographic Poster. This image is attached hereto as Exhibit F.

28. Plaintiffs never consented to or authorized Defendants' use or continued use, display, reproduction, distribution, or sale of the Copyrighted Lithographic Poster.

COUNT ONE

(Copyright Infringement, 17 U.S.C. § 501 *et seq.*)

29. Paragraphs 1 through 28 are incorporated by reference as if set forth in full.
30. The Copyrighted Lithographic Poster is an original pictorial or graphic work and constitutes copyrightable subject matter under 17 U.S.C. §§ 101 and 102.
31. Defendants were not, and are not, licensed or otherwise authorized to distribute, transmit, copy, reproduce, or display the Copyrighted Lithographic Poster.
32. Defendants have infringed Plaintiffs' copyright in the Copyrighted Lithographic Poster through the distribution, transmission, copying, reproduction, or public display of the Copyrighted Lithographic Poster on, among other places, Walmart.com, Art.com, AllPosters.com, and WorkspaceArt.com.
33. On information and belief, the infringement of Plaintiffs' copyright by Defendants was willful. Defendants were aware that Plaintiffs held rights in the Copyrighted Lithographic Poster based on, among other things, the copyright notice on the Copyrighted Lithographic Poster. Defendants' continued distribution, transmission, copying, reproduction, public display, and use of the Copyrighted Lithographic Poster, and Defendants' refusal to cease distribution and display of the Copyrighted Lithographic Poster, evidence Defendants' willful infringement. At a minimum, Defendants' actions were reckless.
34. Plaintiffs have been damaged by the willful infringement of Defendants in a sum to be determined.
35. On information and belief, Defendants can and may continue their infringing activities unless restrained and enjoined. Plaintiffs' remedy at law is not by itself adequate.

COUNT TWO

(Contributory and/or Vicarious Copyright Infringement, 17 U.S.C. § 501 *et seq.*)

36. Paragraphs 1 through 35 are incorporated by reference.
37. The Copyrighted Lithographic Poster is an original pictorial or graphic work and constitutes copyrightable subject matter under 17 U.S.C. §§ 101 and 102.
38. Defendants were not, and are not, licensed or otherwise authorized to distribute, transmit, reproduce, copy, or display the Copyrighted Lithographic Poster.
39. On information and belief, Defendants marketed and sold the Copyrighted Lithographic Poster to individuals and entities knowing and intending that the individuals or entities would use, reproduce, distribute, or publicly display the Copyrighted Lithographic Poster. For example, the Art.com websites include a dedicated division, “Workspace Art for Business Buyers,” and Defendants operate WorkspaceArt.com, both of which showcase Defendants’ products being displayed in public settings.
40. On information and belief, Defendants’ customers, such as these “Business Buyers,” infringed Plaintiffs’ rights in the Copyrighted Lithographic Poster by publicly displaying, using, reproducing, or distributing unauthorized versions of the Copyrighted Lithographic Poster without Plaintiffs’ permission or authorization.
41. On information and belief, Defendants knew that their customers would continue to use, display, reproduce, or distribute the Copyrighted Lithographic Poster.
42. On information and belief, Defendants encouraged and assisted their customers in their infringing acts by providing customers with access to and copies of the Copyrighted Lithographic Poster, with knowledge of the fact that Defendants had no rights to the Copyrighted Lithographic Poster.

43. On information and belief, Defendants could have prevented their customers from infringing Plaintiffs' copyright in the Copyrighted Lithographic Poster by, *inter alia*, removing the Copyrighted Lithographic Poster from their websites or archives, yet Defendants failed to do so.

44. Plaintiffs have been damaged by the vicarious and contributory infringement of Defendants in a sum to be determined.

45. Plaintiffs' remedy at law is not by itself adequate to compensate it for the harm inflicted by Defendants.

COUNT THREE

(Digital Millennium Copyright Act, 17 U.S.C. § 1202)

46. Paragraphs 1 through 45 are incorporated by reference in support of this claim for relief.

47. Plaintiffs printed certain copyright management information on the Copyrighted Lithographic Poster including, *inter alia*, identifying 1980 as the date of registration, identifying Vision Makers, and listing Vision Makers' contact information.

48. On information and belief, the version of the Copyrighted Lithographic Poster displayed on the Walmart/Art.com websites appears to contain Plaintiffs' printed copyright management information including, *inter alia*, identifying 1980 as the date of registration, Vision Makers, and Vision Makers' contact information. However, on information and belief, this information, which is located on the lower left corner of the Copyrighted Lithographic Poster, is illegible or indecipherable to the average website visitor.

49. In framing the Copyrighted Lithographic Poster on its websites, and otherwise presenting the Copyrighted Lithographic Poster for sale on these websites, Defendant lists only some of this copyright management information, such as identifying 1980 as the date of registration. Defendant has omitted other copyright management information, for example by failing to legibly identify

Vision Makers or any other Plaintiff as the entity holding the copyright.

50. In addition, Art.com superimposed watermarks on the Copyrighted Lithographic Poster, which correspond to Defendant's various websites. For example, on Art.com, an Art.com watermark is superimposed over the Copyrighted Lithographic Poster. On AllPosters.com, an AllPosters watermark is superimposed over the Copyrighted Lithographic Poster.

51. In making only some of the copyright management information from the Copyrighted Lithographic Poster legible on the Walmart/Art.com websites, and particularly by reproducing in legible form only select portions of that copyright management information in connection with the display of the Copyrighted Lithographic Poster, Defendants have: (a) intentionally altered or removed copyright management information, (b) distributed copyright management information knowing that certain information has been removed or altered without authority of the Plaintiffs or the law, and (c) distributed works or copies of works knowing that copyright management information has been removed or altered without authority of Plaintiffs or the law. Moreover, Defendants have done all of this knowing, or having a reasonable basis to know, that such actions would induce, enable, facilitate, or conceal infringement.

52. In addition, by including Defendants' own watermarks on the Copyrighted Lithographic Poster, Defendants have knowingly provided false copyright management information, and distributed false copyright management information, intending to induce, enable, facilitate, or conceal infringement.

53. Plaintiffs have been damaged by Defendants' removal and alteration of copyright management information, as well as Defendants' inclusion of false copyright management information, and distribution of the same, in a sum to be determined.

54. Plaintiffs' remedy at law is not by itself adequate to compensate it for the harm inflicted by

Defendants.

COUNT FOUR

(False Advertising and Unfair Competition, 15 U.S.C. § 1125)

55. Paragraphs 1 through 54 are incorporated by reference in support of this claim for relief.
56. Defendants were not, and are not, licensed or authorized to use the Vision Makers name in connection with the sale or licensing of its infringing versions of the Copyrighted Lithographic Poster.
57. On information and belief, Defendants' infringing version of the Copyrighted Lithographic Poster is of inferior quality because, *inter alia*, Defendants' version contains visible defects in the reproduction of the Subject Photograph.
58. By selling infringing, inferior versions of the Copyrighted Lithographic Poster that bear the Vision Makers name, Defendants made materially false or misleading representations of fact concerning the origin of the Copyrighted Lithographic Poster.
59. Defendants' sales of the infringing and inferior versions of the Copyrighted Lithographic Poster in commerce were and are likely to cause confusion or mistake as to the origin, association, or approval of the Copyrighted Lithographic Poster with Plaintiffs, or confusion or mistake as to the characteristics and quality of these goods.
60. Defendants' conduct injured the Plaintiffs by, *inter alia*, causing consumers to associate Plaintiffs and the Vision Makers name with inferior quality products.
61. Defendants' conduct is willful and deliberate.
62. Plaintiffs have been damaged by Defendants' false advertising, unfair competition, and passing off in a sum to be determined.
63. Plaintiffs' remedy at law is not by itself adequate to compensate it for the harm inflicted by

Defendants.

PRAYER FOR RELIEF

WHEREAS, Plaintiffs pray for relief as follows:

- A. For an entry of permanent injunctive relief enjoining and restraining Defendants and their officers, directors, agents, servants, employees, licensees and all other persons in privity or acting in concert with them from doing any of the following: distributing, transmitting, copying, publicly displaying, or creating derivative works of the Copyrighted Lithographic Poster;
- B. For independent awards, at Plaintiffs' election, pursuant to 17 U.S.C. § 504, of either (1) the actual damages suffered by Plaintiffs with respect to past infringement, plus any additional profits of Defendants that are attributable to the infringement that are not taken into account in computing the actual damages; or (2) statutory damages as provided by § 504(c);
- C. For a finding that the independent infringement by Defendants was willful, and for independent awards to Plaintiffs, at their election, of statutory damages against Defendants for willfully committing infringement as provided by 17 U.S.C. § 504;
- D. For a finding that Defendants violated the Digital Millennium Copyright Act, and for an award to Plaintiffs, pursuant to 17 U.S.C. § 1203, of either (1) the actual damages suffered by Plaintiffs with respect to past violations, plus any additional profits to Defendants that are attributable to the violation that are not taken into account in computing actual damages; or (2) statutory damages for each violation as provided by § 1203(c)(3);
- E. For an order that Defendants account for all sales, revenues, costs and profits from their wrongful conduct and unauthorized use of Plaintiffs' Copyrighted Lithographic Poster, and that Defendants pay Plaintiffs damages in an amount to be proven at trial, but including Defendants' profits and actual damages suffered by Plaintiffs as a result of Defendants' wrongful acts;

- F. For an award of Defendants' profits and Plaintiffs' damages pursuant to 15 U.S.C. § 1117;
- G. For an award of Plaintiffs' attorneys' fees, expenses and costs, pursuant to 17 U.S.C. §§ 505 and 1203 and 15 U.S.C. § 1117;
- H. For an award to Plaintiffs of pre-and post-judgment interest;
- I. For an award to Plaintiffs of such other and further relief as the Court deems just and proper.

JURY DEMAND

Plaintiffs hereby demand a trial by jury as to the claims in this action.

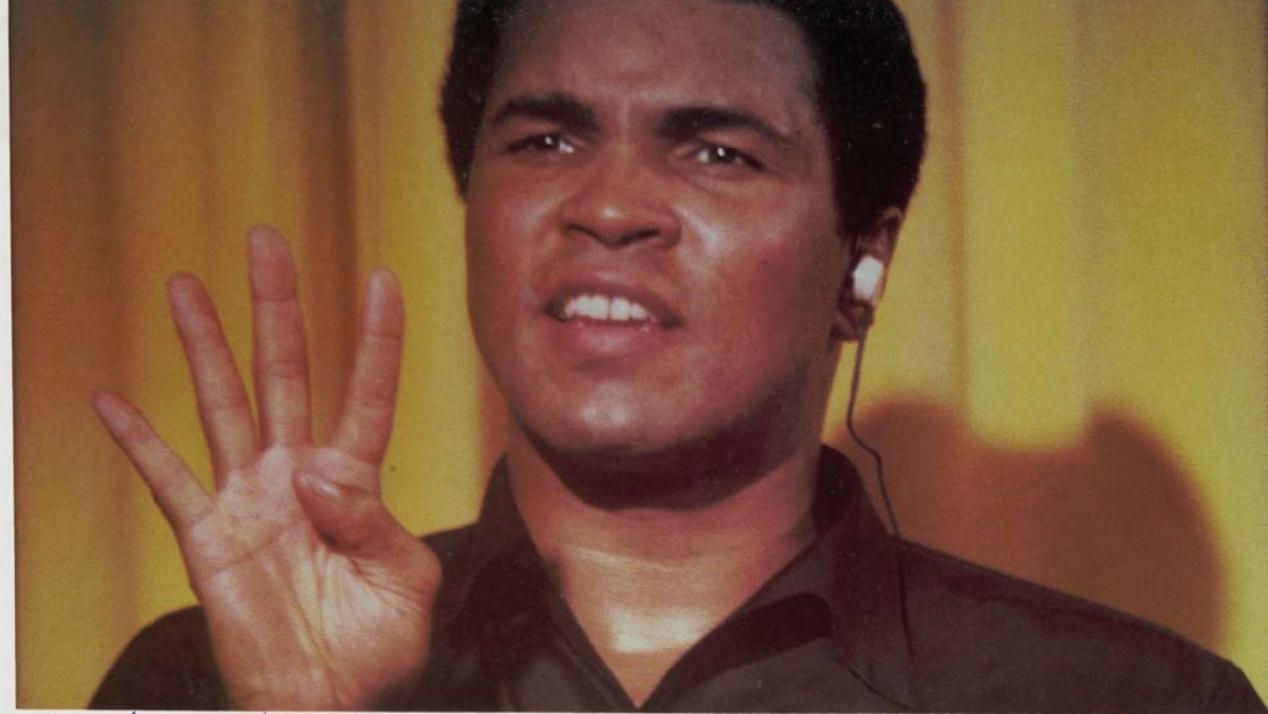
Dated: December 10, 2020

Respectfully submitted,

/s/ Jeremy S. Spiegel
Jeremy S. Spiegel, Esq. (Atty. ID 205859)
LAW OFFICE OF JEREMY SPIEGEL
One South Broad Street, Suite 1500
Philadelphia, PA 19107
Ph: (215) 609-3154
Fax: (215) 568-9319
Spiegel@JeremySpiegelLaw.com

Exhibit A

ALI ALI ALI ALI ALI ALI ALI



Muhammad Ali.

"I SHALL RETURN"

TUNNEY HUNSAKER Oct 29, 1960 Louisville, Kentucky W-6	HERB SILER Dec 27, 1960 Miami Beach, Florida KO-4	TONY ESPERTI Jan 17, 1961 Miami Beach, Florida KO-3	JIM ROBINSON Feb 7, 1961 Miami Beach, Florida KO-1	DONNIE FLEEMAN Feb 21, 1961 Miami Beach, Florida KO-7	LAMAR CLARK April 19, 1961 Louisville, Kentucky KO-2	DUKE SABEDONG June 26, 1961 Las Vegas, Nevada W-10	ALONZO JOHNSON July 22, 1961 Louisville, Kentucky W-10	ALEX MITEFF Oct 7, 1961 Louisville, Kentucky KO-8	WILLIE BESMANOFF Nov 29, 1961 Louisville, Kentucky KO-7
SONNY BANKS Feb 10, 1962 New York, New York KO-4	DON WARNER Feb 28, 1962 Miami Beach, Florida KO-4	GEORGE LOGAN April 23, 1962 Los Angeles, California KO-4	BILLY DANIELS May 19, 1962 New York, New York KO-7	ALEJANDRO LAVORANTE July 20, 1962 Los Angeles, California KO-5	ARCHIE MOORE Nov 15, 1962 Los Angeles, California KO-4	CHARLIE POWELL Jan 24, 1963 Pittsburgh, Pennsylvania KO-3	DOUG JONES March 13, 1963 New York, New York W-10	HENRY COOPER June 18, 1963 London, England KO-5	SONNY LISTON Feb 25, 1964 Miami Beach, Florida KO-7
SONNY LISTON May 25, 1965 Lewiston, Maine KO-1	FLOYD PATTERSON Nov 22, 1965 Las Vegas, Nevada KO-12	GEORGE CHUVALO March 29, 1966 Toronto, Canada W-15	HENRY COOPER May 21, 1966 London, England KO-6	BRIAN LONDON August 6, 1966 London, England KO-3	KARL MILDENBERGER Sept 10, 1966 Frankfurt, Germany KO-12	CLEVELAND WILLIAMS Nov 14, 1966 Houston, Texas KO-3	ERNIE TERRELL Feb 6, 1967 Houston, Texas W-15	ZORA FOLLEY March 22, 1967 New York, New York KO-7	JERRY QUARRY Oct 26, 1970 Atlanta, Georgia KO-3
OSCAR BONAVENA Dec 7, 1970 New York, New York KO-15	JOE FRAZIER March 8, 1971 New York, New York L-15	JIMMY ELLIS July 26, 1971 Houston, Texas KO-12	BUSTER MATHIS Nov 17, 1971 Houston, Texas W-12	JURGEN BLIN Dec 26, 1971 Zurich, Switzerland KO-7	MAC FOSTER April 1, 1972 Tokyo, Japan W-15	GEORGE CHUVALO May 1, 1972 Vancouver, British Columbia W-12	JERRY QUARRY June 27, 1972 Las Vegas, Nevada KO-7	AL LEWIS July 19, 1972 Dublin, Ireland KO-11	FLOYD PATTERSON Sept 20, 1972 New York, New York KO-7
BOB FOSTER Nov 21, 1972 Lake Tahoe, Nevada KO-8	JOE BUGNER Feb 14, 1973 Las Vegas, Nevada W-12	KEN NORTON March 31, 1973 San Diego, California L-12	KEN NORTON Sept 10, 1973 Los Angeles, California W-12	RUDI LUBBERS Oct 20, 1973 Jakarta, Indonesia W-12	JOE FRAZIER Jan 26, 1974 New York, New York W-12	GEORGE FOREMAN Oct 30, 1974 Kinshasa, Zaire KO-8	CHUCK WEPNER March 24, 1975 Cleveland, Ohio KO-15	RON LYLE May 16, 1975 Las Vegas, Nevada KO-11	JOE BUGNER July 1, 1975 Kuala Lumpur, Malaysia W-15
JOE FRAZIER Oct 1, 1975 Manila, Philippines KO-14	JEAN PIERRE COOPMAN Feb 20, 1976 San Juan, Puerto Rico KO-5	JIMMY YOUNG April 30, 1976 Landover, Maryland W-15	RICHARD DUNN May 24, 1976 Munich, Germany KO-5	KEN NORTON Sept 28, 1976 New York, New York W-15	ALFREDO EVANGELISTA May 16, 1977 Landover, Maryland W-15	ERNIE SHavers Sept 29, 1977 New York, New York W-15	LEON SPINKS Feb 15, 1978 Las Vegas, Nevada L-15	LEON SPINKS Sept 15, 1978 New Orleans, Louisiana W-15	LARRY HOLMES Oct 2, 1980 Las Vegas, Nevada L-10

Exhibit B

This certificate, issued under the seal of the Copyright Office in accordance with the provisions of section 410(a) of title 17, United States Code, attests that copyright registration has been made for the work identified below. The information in this certificate has been made a part of the Copyright Office records.

Doris L. Gadd

REGISTER OF COPYRIGHTS
United States of America

REGISTRATION NUMBER		
VA	63-797	
VAU		
EFFECTIVE DATE OF REGISTRATION		
8 DEC 1980		
(Month)	(Day)	(Year)

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE CONTINUATION SHEET (FORM VA/CON)

1 Title	<p>TITLE OF THIS WORK:</p> <p>ALIALIALIALIALIALI</p> <p>Previous or Alternative Titles: _____</p>	<p>NATURE OF THIS WORK: (See instructions)</p> <p>Photographic/Graphic Poster</p>
<p>PUBLICATION AS A CONTRIBUTION: (If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared.)</p> <p>Title of Collective Work: N/A Vol. ____ No. ____ Date ____ Pages ____</p>		

2 Author(s)	<p>IMPORTANT: Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). If any part of this work was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates blank.</p>		
	NAME OF AUTHOR: Peter F. Rogers Was this author's contribution to the work a "work made for hire"? Yes..... No. X	DATES OF BIRTH AND DEATH: Born 1947 Died..... <small>(Year) (Year)</small>	
1	AUTHOR'S NATIONALITY OR DOMICILE: Citizen of U.S. { or { Domiciled in <small>(Name of Country)</small> <small>(Name of Country)</small>	WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK: Anonymous? Yes..... No X Pseudonymous? Yes..... No X <small>If the answer to either of these questions is "Yes," see detailed instructions attached.</small>	
	AUTHOR OF: (Briefly describe nature of this author's contribution) Co-Author of Photograph & Graphic Drawing	DATES OF BIRTH AND DEATH: Born 1944 Died..... <small>(Year) (Year)</small>	
2	NAME OF AUTHOR: Henry R. Haney Was this author's contribution to the work a "work made for hire"? Yes..... No. X ..	WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK: Anonymous? Yes..... No X Pseudonymous? Yes..... No X <small>If the answer to either of these questions is "Yes," see detailed instructions attached.</small>	
	AUTHOR'S NATIONALITY OR DOMICILE: Citizen of U.S. { or { Domiciled in <small>(Name of Country)</small> <small>(Name of Country)</small>	DATES OF BIRTH AND DEATH: Born Died..... <small>(Year) (Year)</small>	
3	AUTHOR'S NATIONALITY OR DOMICILE: Citizen of { or { Domiciled in <small>(Name of Country)</small> <small>(Name of Country)</small>	WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK: Anonymous? Yes..... No..... Pseudonymous? Yes..... No..... <small>If the answer to either of these questions is "Yes," see detailed instructions attached.</small>	
	AUTHOR OF: (Briefly describe nature of this author's contribution)		

3 Creation and Publication	YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED: Year. 1980 .. (This information must be given in all cases.)	DATE AND NATION OF FIRST PUBLICATION: Date. September 9, 1980 (Month) (Day) (Year) Nation. United States (Name Of Country) (Complete this block ONLY if this work has been published.)
--	--	--

4 Claimant(s)	NAME(S) AND ADDRESS(ES) OF COPYRIGHT CLAIMANT(S):	
	Peter F. Rogers 5914-A Wayne Avenue Philadelphia, PA. 19144	Henry R. Haney 2144 B South John Russell Circle Elkins Park, PA. 19117
	TRANSFER: (If the copyright claimant(s) named here in space 4 are different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.)	

- Complete all applicable spaces (numbers 5-9) on the reverse side of this page
- Follow detailed instructions attached • Sign the form at line 8

DO NOT WRITE HERE

Page 1 of 2 pages

VA 63-797

EXAMINED BY: <i>OW</i>	APPLICATION RECEIVED: 08 DEC 1980	FOR COPYRIGHT OFFICE USE ONLY
CHECKED BY: <i>PK</i>	DEPOSIT RECEIVED: 8 DEC 1980	
CORRESPONDENCE: <input type="checkbox"/> Yes	REMITTANCE NUMBER AND DATE: 72411 DEC 880	
DEPOSIT ACCOUNT FUND USED: <input type="checkbox"/>		

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED ADDITIONAL SPACE, USE CONTINUATION SHEET (FORM VA/CON)

PREVIOUS REGISTRATION:

- Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office? Yes.....No
- If your answer is "Yes," why is another registration being sought? (Check appropriate box)
 - This is the first published edition of a work previously registered in unpublished form.
 - This is the first application submitted by this author as copyright claimant.
 - This is a changed version of the work, as shown by line 6 of the application.
- If your answer is "Yes," give: Previous Registration Number.....Year of Registration.....

5

Previous
Registration

COMPILE OR DERIVATIVE WORK: (See instructions)

6

Compilation
or
Derivative
WorkPREEXISTING MATERIAL: (Identify any preexisting work or works that this work is based on or incorporates.)
.....
.....
.....MATERIAL ADDED TO THIS WORK: (Give a brief, general statement of the material that has been added to this work and in which copy-right is claimed.)
.....
.....
.....

DEPOSIT ACCOUNT: (If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.)

Name:.....

Account Number:.....

CORRESPONDENCE: (Give name and address to which correspondence about this application should be sent.)

Name:..... **Vision Makers, Inc.**.....Address: **2144 B South John Russell Circle**.....(Apartment) **Elkins Park, PA. 19117**.....

(City) (State) (ZIP)

7

Fee and
Correspondence

CERTIFICATION: * I, the undersigned, hereby certify that I am the: (Check one)

Author Other copyright claimant Owner of exclusive right(s) Authorized agent of (Name of author or other copyright claimant, or owner of exclusive right(s))
of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Handwritten signature: (X) *Peter F. Rogers*.....Typed or printed name: *Peter F. Rogers*..... Date **11/25/80**.....

8

Certificati
(Applicat
must be
signed)

VISION MAKERS, INC.,.....
(Name)
2144 B South John Russell Circle.....
(Number, Street and Apartment Number)
Elkins Park, PA. 19117.....
(City) (State) (ZIP code)

MAIL
CERTIFICATE
TO(Certificate will
be mailed in
window envelope)

9

Address
For Return
of
Certifi

Exhibit C

Screenshot of Art.com product page for 'I Shall Return' poster:

I Shall Return', Poster Listing the Victories of Muhammad Ali, 1980

Print Size: 10" x 24" (13.1" x 19.9" No Border)

Paper Type: Giclee Print

\$54.99 \$27.49

Add to Cart

Available Frames: Price includes print & frame

See more frames

Screenshot of AllPosters product page for 'I Shall Return' poster:

I Shall Return', Poster Listing the Victories of Muhammad Ali, 1980

Print Size: 10" x 24" (13.1" x 19.9" No Border)

Options: Giclee Print, Acrylic Front, Magnetic Hangers, Wood Mount, Canvas, Framed Laminated, Bevel Frame, Black Frame, White Frame, Silver Frame, Gold Frame, Colorframe

Final Dimensions: 10" x 24"

Price: \$23.99

Add to Cart

About the Product: This giclee print offers beautiful color accuracy on a high-quality paper that is a great option for framing with its smooth and low surface. Giclee Print is a printing process where millions of ink droplets are sprayed onto the paper surface creating natural color transitions.

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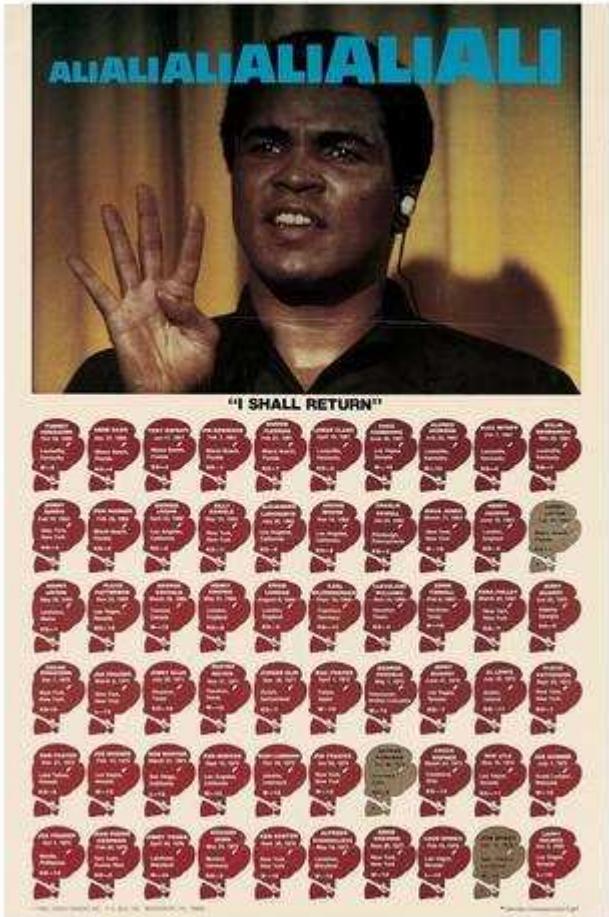


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I Shall Return', Poster Listin



ABOUT THE PRODUCT

SHIPPING AND RETURNS

This giclee print offers beautiful color accuracy on a highquality paper gsm that is a great option for framing with its smooth acid free surface. Giclee French for to spray is a printing process where millions of ink droplets are sprayed onto the papers surface creating natural color transitions.

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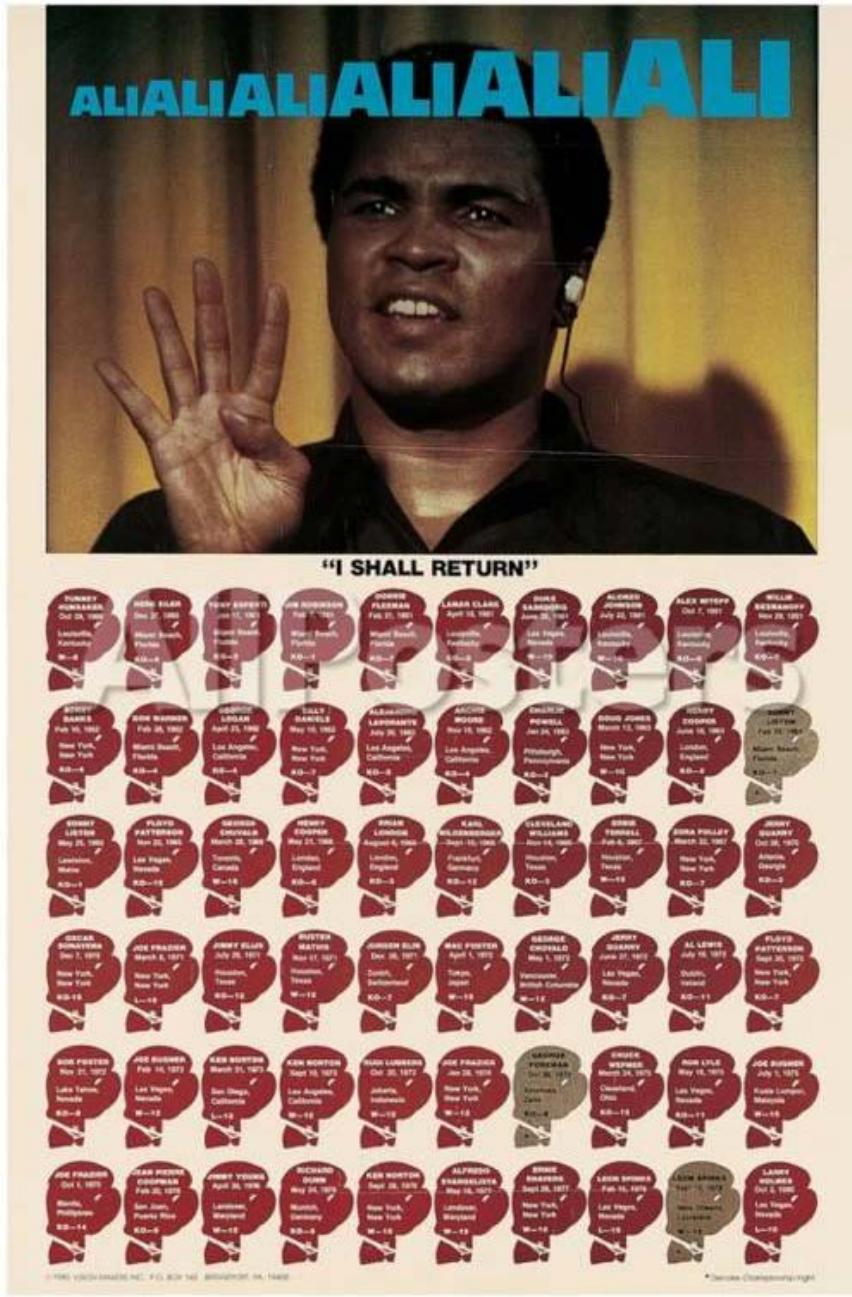
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This giclee print offers beautiful color accuracy on a highquality paper gsm that is a great option for framing with its smooth acid free surface Giclee French for to spray is a printing process where millions of ink droplets are sprayed onto the papers surface.

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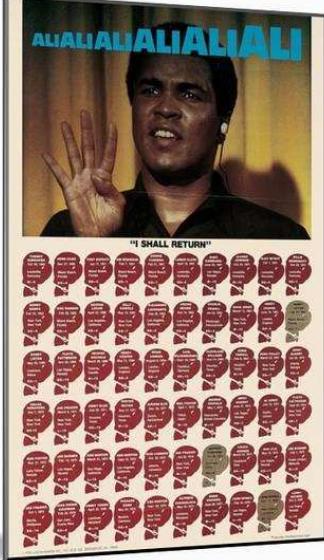


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I Shall Return', Poster Listing the Victories of Muhammad Ali, 1980

Print Size

12" x 18" (9.8" x 14.9" No B...

Paper Type

Giclee Print

Frame Details

Wood Mount

Finished Size

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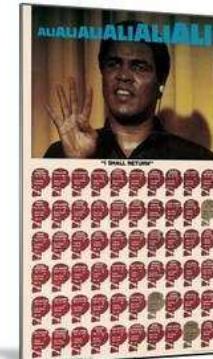
About This Piece

The Art

I Shall Return poster listing the victories of Muhammad Ali colour litho American School th century Private Collection Photo Christies Images Bridgeman Images

This collectible double-sided poster is heavier than your standard poster. The unique printing process creates a backside image that mirrors the front, producing a deep and life-like image.

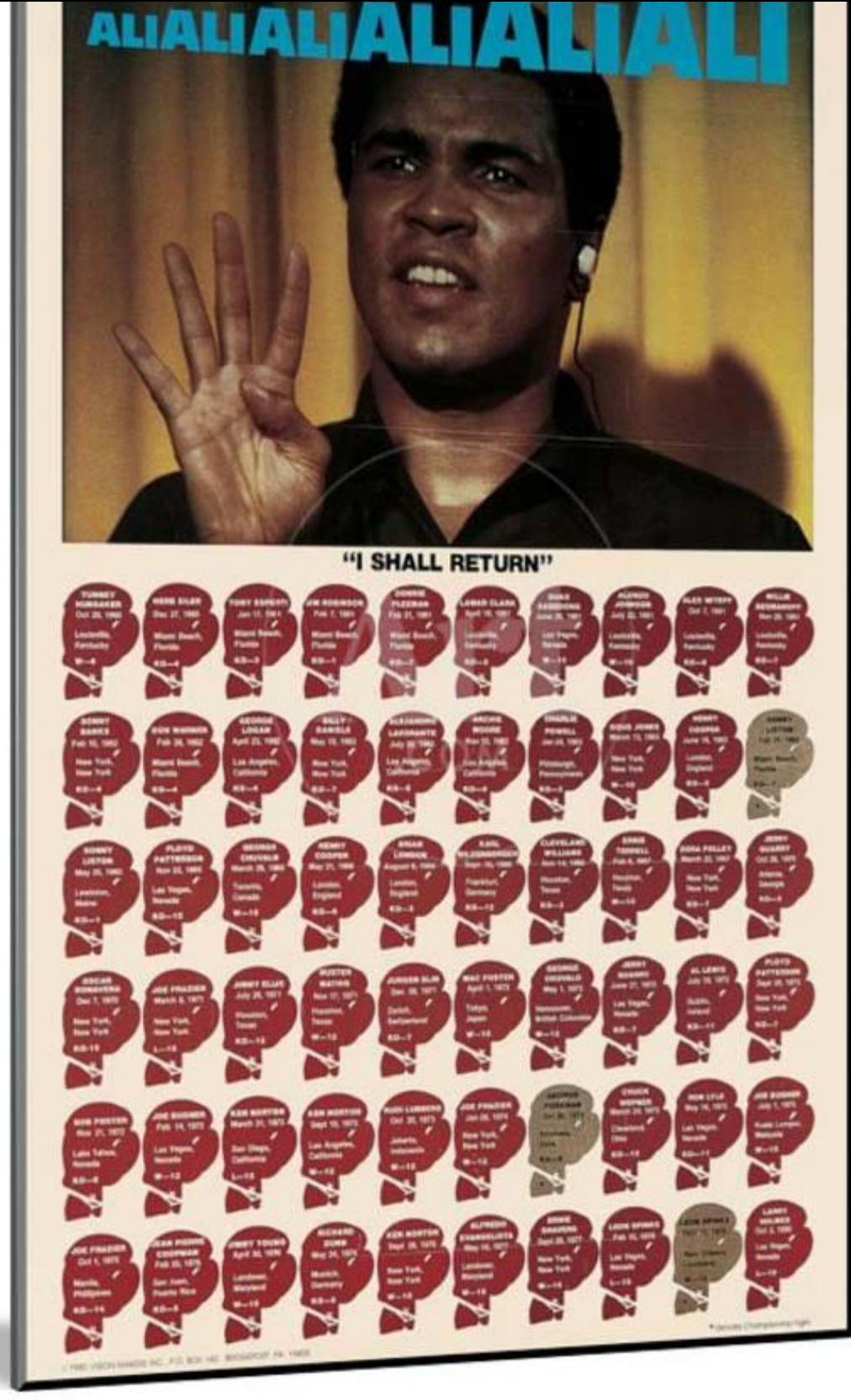
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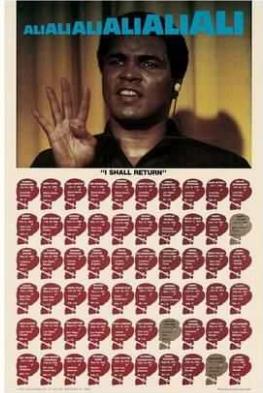
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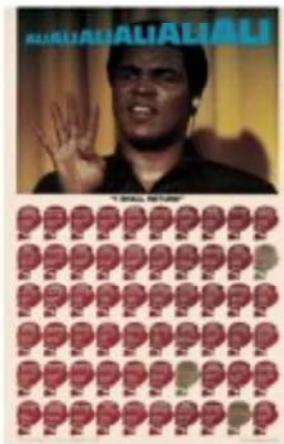
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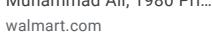


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